

1 **JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

2 E-mail: jfoley@hkm.com

MARTA D. KURSHUMOVA, ESQ.

3 Nevada Bar No. 14728

E-mail: mkurshumova@hkm.com

4 **DANA SNIEGOCKI, ESQ.**

Nevada Bar No. 11715

5 E-mail: dsniegocki@hkm.com

HKM EMPLOYMENT ATTORNEYS LLP

6 1785 East Sahara, Suite 300

Las Vegas, Nevada 89104

7 Tel: (702) 805-8340

Fax: (702) 920-8112

8 *Attorneys for Plaintiff*

9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10 BRETT WAGGONER, an Individual,

11 Plaintiff,

12 vs.

13 NYE COUNTY, CHRIS ARABIA, in his
14 individual and official capacity; LEO
BLUNDO, in his individual and official
15 capacity; DOES 1-X, ROE
CORPORATIONS 1-X,

16 Defendants.

CASE NO.: 2:20-cv-01044-JAD-BNW

**STIPULATION AND ORDER TO
CONTINUE EARLY NEUTRAL
EVALUATION**

(FIRST REQUEST)

17
18 The parties, Plaintiff, BRETT WAGGONER, ("Plaintiff" or "Mr. Waggoner" and
19 Defendant, NYE COUNTY, ("Defendant Nye") and Defendants, CHRIS ARABIA and LEO
20 BLUNDO, (collectively "Defendants Arabia & Blundo"), by and through their respective
21 attorneys of record, hereby stipulate and agree as follows:

22 1. On August 11, 2020, the Court entered an Order (ECF No. 17) staying discovery.
23 Pursuant to such order, discovery is stayed until October 20, 2020.

1 2. Such stay is for the purpose of allowing Plaintiff time to find other counsel and
2 for Plaintiff's new counsel to familiarize themselves with the case.

3 3. Plaintiff's current counsel also filed their Second Motion to Withdraw as
4 Attorney on August 11, 2020 (ECF No. 19), with their first such motion being denied without
5 prejudice due to a procedural error.

6 4. In light of Plaintiff's current counsel's request to withdraw as attorney of record
7 for the Plaintiff, and the current stay of discovery to allow Plaintiff a suitable period to secure
8 new counsel, the parties hereby request that the Early Neutral Evaluation, currently set for
9 September 25, 2020, be continued for a period of sixty (60) days and reset to a date suitable for
10 the Court on or after November 24, 2020.

1 Dated: August 12, 2020

Dated: August 12, 2020

2 LEMONS, GRUNDY & EISENBERG

MARQUIS AURBACH COFFING

3 By: /s/ Rebecca Bruch

By: /s/ Brian R. Hardy

REBECCA BRUCH, ESQ.

CRAIG R. ANDERSON, ESQ.

4 Nevada Bar No. 7289

Nevada Bar No. 6882

6005 Plumas Street, Third Floor

Email: canderson@maclaw.com

5 Reno, Nevada 89519

BRIAN R. HARDY, ESQ.

Telephone: (775) 786-6868

Nevada Bar No. 10068

6 Email: rb@lge.net

Email: bhardy@maclaw.com

Attorneys for Defendant Nye County

10001 Park Run Drive

Las Vegas, Nevada 89145

Telephone: (702) 382-0711

Facsimile: (702) 382-5816

Attorneys for Defendants Chris Arabia and Leo Blundo

9 Dated: August 12, 2020

10 HKM EMPLOYMENT ATTORNEYS LLP

11 By: /s/ Jenny L. Foley

JENNY L. FOLEY, Ph.D., ESQ.

Nevada Bar No. 9017

13 E-mail: jfoley@hkm.com

MARTA D. KURSHUMOVA, ESQ.

14 Nevada Bar No. 14728

E-mail: mkurshumova@hkm.com

DANA SNIEGOCKI, ESQ.

15 Nevada Bar No. 11715

E-mail: dsniegocki@hkm.com

16 1785 East Sahara, Suite 300

Las Vegas, Nevada 89104

17 Telephone: (702) 805-8340

Facsimile: (702) 920-8112

18 *Attorneys for Plaintiff*

19 **ORDER**

20 **IT IS SO ORDERED** that the Early Neutral Evaluation Session currently set for
21 **September 25, 2020 at 9:00 a.m.** shall be vacated and rescheduled to **December**
22 **18, 2020 at 9:00 a.m.** The written confidential evaluation statements shall be
submitted electronically to **Emily_Santiago@nvd.uscourts.gov** on **December**
23 **11, 2020.**

24 
U.S. MAGISTRATE JUDGE

Dated: August 14, 2020